

# WYATT & ASSOCIATES

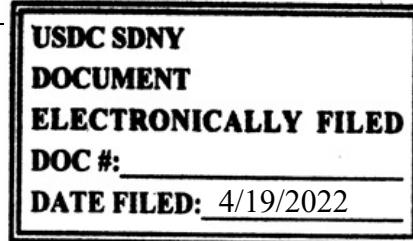
EMPLOYMENT LAW, HR SOLUTIONS

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VIA ECF

April 19, 2022

Hon. Katharine H. Parker  
United States Magistrate Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street, Room 1330  
New York, NY 10007



The conference scheduled for April 21, 2022 is hereby adjourned to a telephone conference on May 31, 2022 at 3:45 p.m. Counsel for the parties are directed to call into the Court's conference line: 866-434-5269; access code: 4858267 at the scheduled time.

RE: Amanda Cintron v. Albert Einstein College of Medicine, et al.

Docket No.: 1:21-cv-06256-JGK

Joint Request for Adjournment of Pre-Motion Conference Schedu

**SO ORDERED:**

*Katharine H. Parker*  
HON. KATHARINE H. PARKER  
UNITED STATES MAGISTRATE JUDGE

Dear Judge Parker:

4/19/2022

The parties to the above-captioned action hereby write jointly to respectfully request that the Court adjourn the pre-motion conference currently scheduled for April 21, 2022 at 4:00pm.

On March 29, 2022, the parties appeared for a pre-motion conference to discuss Plaintiff's motion to compel. (Dkt. # 19). The Court found that the dispute was premature and directed the parties to develop the record through deposition testimony (specifically, the deposition of Joseph Ben-Ari), to meet and confer following any depositions, and be prepared to revisit the dispute before the Court in the event the parties could not reach an agreement (Dkt. # 26).

The parties worked diligently to schedule the deposition of Ben-Ari as soon as reasonably possible. Importantly, Plaintiff proposed a number of dates in April, but unfortunately these dates did not work for Defendants, including Mr. Ben-Ari. The parties have now conferred on a date and noticed the deposition of Ben-Ari for May 9, 2022. In addition, the parties have also conferred and tentatively agreed on the date for the deposition of Robert Cancellieri. The Plaintiff has also noticed a 30(b)(6) deposition and the parties are currently negotiating topics for the 30(b)(6) deposition, which will allow for the parties to proceed with additional depositions without further delays.

The parties do not believe they will be prepared to fully brief the Court by April 21, 2022 on the pending discovery dispute and would respectfully request that the pre-motion conference be adjourned to a date after May 9, 2022.

Additionally, as the close of fact discovery is currently scheduled for May 12, 2022, the parties intend to file a joint request for an extension of discovery dates, to give the parties more time to fully conduct necessary discovery (including resolving the pending dispute), as well as prior to scheduling and conducting necessary depositions.

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Respectfully submitted,

By her attorneys

THE PLAINTIFF

Amanda Cintron



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Dated: April 19, 2022